Hon. Judge Ricardo S. Martinez

R. Andrew Free
Bank of America Plaza
414 Union Street, Suite 900
Nashville, TN 37219
Telephone: (615) 244-2202
Facsimile: (615) 244-4345
Andrew@ImmigrantCivilRights.com

Gregory H. Siskind
SISKIND SUSSER, PC
1028 Oakhaven Road
Memphis, TN 38119
Telephone: (901) 682-6455
Facsimile: (901) 339-9604
GSiskind@visalaw.com

Robert H. Gibbs
Robert Pauw
GIBBS HOUSTON PAUW
1000 Second Avenue, Suite 1600
Seattle, WA 98104-1003
(206) 682-1080

Attorneys for Named Plaintiffs
and the proposed classes

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

CHINTAN MEHTA, et al., Plaintiffs, v. UNITED STATES DEPARTMENT OF STATE, et al., Defendants.	Case No. 2:15-cv-1543-RSM PLAINTIFFS' EMERGENCY MOTION FOR RELIEF FROM DEADLINE NOTE ON MOTION CALENDAR: March 18, 2016

PLAINTIFFS' EMERGENCY MOTION FOR RELIEF FROM DEADLINE

1. Plaintiffs' hereby submit this emergency motion requesting that the Court extend the deadline for the filing of Plaintiffs' Response to Defendants' Motion to Dismiss the Second Amended Complaint (ECF No. 27) by one day, from March 7, 2016 to March 8, 2016:

2. Plaintiffs engaged attorney Joel Sanderson to complete the drafting of the Response to Defendants' Motion to Dismiss. The drafting is nearly complete.

3. On the afternoon of Sunday, March 6, 2016, Mr. Sanderson suffered a severe migraine which caused debilitating symptoms rendering him incapable of completing the Response. The symptoms substantially incapacitated Mr. Sanderson and he was thus unable to notify Plaintiffs' counsel of the situation until 10:00 a.m. CST.

4. Federal Rule of Civil Procedure 6(b)(1)(A) allows the Court to extend the deadline for good cause shown. FED R. CIV. P. 6(b)(1)(A). Plaintiffs submit this motion not for delay, but for the good cause shown. The extension will not cause any undue prejudice to the other parties in this case.

5. Local Civil Rule 7(j) governs the Courts' process for motions for relief from deadline and permits motions based on emergencies.

6. As directed by Local Civil Rule7(j), Plaintiffs' counsel contacted Defendants' counsel Sarah Wilson and Greg Girdharry to request a one day extension to the Response deadline. They were both unavailable and Plaintiffs' counsel left voicemails for each.

7. Plaintiffs hereby move this Court to extend the deadline for the Response to Defendants' Motion to Dismiss to March 8, 2016.

GIBBS HOUSTON PAUW
1000 Second Avenue, Suite 1600
Seattle, WA 98104-1003
(206) 682-1080

8. Plaintiffs notes that they are amenable to a corresponding one day extension to Defendants' subsequent Reply to Plaintiffs' response.

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Dated: March 7, 2016

Respectfully submitted,

/s/ Robert Pauw

ROBERT H. GIBBS
ROBERT PAUW
Gibbs Houston Pauw
1000 Second Avenue, Suite 1600
Seattle, WA 98104
206-682-1080
Email: rgibbs@ghp-law.net

ATTORNEYS FOR PLAINTIFFS

GREGORY ALLEN SISKIND
Siskind Susser, PC
1028 Oakhaven Road
Memphis, TN 38119
901-682-6455
Email: gsiskind@visalaw.com

ROBERT ANDREW FREE
Barrett Johnston Martin & Garrison, PLLC
414 Union Street, Suite 900
Nashville, TN 37219
615-432-2642
Email: Andrew@ImmigrantCivilRights.com

CERTIFICATE OF CONFERENCE

I hereby certify that, on March 7, 2016, counsel for the Plaintiffs contacted counsel for the Defendants by phone regarding this request to extend the deadline for filing Plaintiffs' Response to Defendants' Motion to Dismiss. Counsel for the Defendants were not available and counsel for the Plaintiffs left voicemails.

/s/ Robert Pauw
ROBERT PAUW

GIBBS HOUSTON PAUW
1000 Second Avenue, Suite 1600
Seattle, WA 98104-1003
(206) 682-1080

Certificate of Service

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants identified on the Notice of Electronic Filing (NEF), listed below, on January 8, 2016.

Glenn M. Girdharry
Assistant Director
United States Department of Justice
Civil Division
Office of Immigration Litigation
District Court Section
P.O. Box 868, Ben Franklin Station
Washington, DC 20044
F: (202) 305-7000
glenn.girdharry@usdoj.gov

Sarah Wilson
United States Department of Justice
Civil Division
Office of Immigration Litigation
District Court Section
P.O. Box 868, Ben Franklin Station
Washington, D.C. 20044
Sarah.S.Wilson@usdoj.gov

Erez Reuveni
United States Department of Justice
Civil Division
450 5th Street NW
Washington, DC 20549
202-307-4293
Erez.r.reuveni@usdoj.gov

Dated: January 8, 2015 /s/ Robert Pauw